

Fill in this information to identify the case:

Debtor 1 Thomas J. Collins, Jr. aka Thomas J. Collins

Debtor 2 \_\_\_\_\_  
(Spouse, if filing)

United States Bankruptcy Court for the: MIDDLE District of PA  
(State)

Case number 16-bk-03900-MJC

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: United Peoples Bank, National Association Court claim no. (if known): 2

Last 4 digits of any number you use to identify the debtor's account: 1 5 3 1

Property address: 229 Ridge Drive  
Number Street  
Milford, PA 18337  
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 03 / 01 / 2022  
MM / DD / YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ \_\_\_\_\_
- c. **Total.** Add lines a and b. (c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

MM / DD / YYYY

Debtor 1 Thomas J. Collins, Jr.  
First Name Middle Name Last Name

Case number (if known) 16-bk-03900-MJC

**Part 4:** Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5:** Sign Here

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

**X** /s/ Alicia Sandoval  
Signature

Date 02 / 22 / 2022

Print Alicia Sandoval, Esquire  
First Name Middle Name Last Name

Title Attorney

Company Pincus Law Group, PLLC

**If different from the notice address listed on the proof of claim to which this response applies:**

Address 425 RXR Plaza  
Number Street

Uniondale, NY 11556  
City State ZIP Code

Contact phone ( 516 ) 699 – 8902

Email asandoval@pincuslaw.com

**IN THE UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

In Re:	:	Bankruptcy No. 16-bk-03900-MJC
Thomas J. Collins, Jr. <i>aka</i> Thomas J. Collins	:	
	:	Chapter 13
Debtor	:	
	:	
Admirals Bank	:	
	:	
Movant	:	
vs.	:	
	:	
Thomas J. Collins, Jr. <i>aka</i> Thomas J. Collins	:	
	:	
Debtor/Respondent	:	
	:	
Jack N Zaharopoulos	:	
Trustee/Respondent	:	

**CERTIFICATION OF SERVICE**

I, Alicia Sandoval, Esquire certify that on February 22, 2022, I served true and correct copies of the Response to Notice of Final Cure on the following parties in the manner specified for each party below:

Phillip W. Stock, Esq.  
Via ECF  
*Attorney for Debtor*

Jack N Zaharopoulos  
Via ECF  
*Trustee*

Thomas J. Collins, Jr.  
229 Ridge Drive  
Milford, PA 18337  
Via First Class Mail  
*Debtor*

Respectfully submitted,

**PINCUS LAW GROUP, PLLC**

By: /s/ Alicia Sandoval  
Alicia Sandoval, Esquire  
425 RXR Plaza  
Uniondale, NY 11556  
Telephone: 516-699-8902  
Fax: 516-279-6990  
Email: asandoval@pincuslaw.com